

SETTLEMENT DATE AND TIME: August 12, 2014 at 12:00 noon (Eastern Time)  
OBJECTION DATE AND TIME: August 12, 2014 at 11:30 a.m. (Eastern Time)

KING & SPALDING LLP  
1185 Avenue of the Americas  
New York, New York 10036  
Telephone: (212) 556-2100  
Facsimile: (212) 556-2222  
Arthur Steinberg  
Scott Davidson

KIRKLAND & ELLIS LLP  
300 North LaSalle  
Chicago, IL 60654  
Telephone: (312) 862-2000  
Facsimile: (312) 862-2200  
Richard C. Godfrey, P.C. (admitted *pro hac vice*)  
Andrew B. Bloomer, P.C. (admitted *pro hac vice*)

*Attorneys for General Motors LLC*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re	:	Chapter 11
	:	
MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,	:	Case No.: 09-50026 (REG)
f/k/a General Motors Corp., <i>et al.</i>	:	
	:	
Debtors.	:	(Jointly Administered)
-----X		

**NOTICE OF SETTLEMENT OF ORDER DENYING THE  
RELIEF REQUESTED IN PLAINTIFFS LAWRENCE AND  
CELESTINE ELLIOTT'S NO STAY PLEADING PURSUANT TO  
THE COURT'S SCHEDULING ORDERS AND MOTION FOR ORDER  
OF DISMISSAL FOR LACK OF SUBJECT MATTER JURISDICTION  
PURSUANT TO BANKR. R. 7012(b) AND FOR RELATED RELIEF**

**PLEASE TAKE NOTICE** that, pursuant to Rule 9074-1 of the Local Rules of  
Bankruptcy Procedure for the Southern District of New York, the proposed *Order Denying The  
Relief Requested In Plaintiffs Lawrence And Celestine Elliott's No Stay Pleading Pursuant To  
The Court's Scheduling Orders And Motion For Order Of Dismissal For Lack Of Subject Matter*

*Jurisdiction Pursuant To Bankr. R. 7012(B) And For Related Relief*, a copy of which is annexed hereto, will be presented for signature and entry to the Honorable Robert E. Gerber, United States Bankruptcy Judge, in Room 523 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004 on **August 12, 2014 at 12:00 noon (Eastern Time)**.

**PLEASE TAKE FURTHER NOTICE** that objections or proposed counter-orders must be made in writing and shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and shall be filed with the Bankruptcy Court (a) electronically in accordance with General Order M-242 (which can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov)) by registered users of the Bankruptcy Court's filing system, and (b) by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with a hard copy delivered directly to Chambers), in accordance with General Order M-182 (which can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov)), and served in accordance with General Order M-242, and on (i) King & Spalding LLP, 1185 Avenue of the Americas, New York, New York 10036 (Attn: Arthur Steinberg, Esq.); and (ii) Kirkland & Ellis LLP, 300 North LaSalle Street, Chicago, Illinois 60654 (Attn: Richard C. Godfrey, Esq.), so as to be received no later than **August 12, 2014, at 11:30 a.m. (Eastern Time)**.

Dated: New York, New York  
August 7, 2014

Respectfully submitted,

/s/ Scott I. Davidson

Arthur Steinberg

Scott Davidson

KING & SPALDING LLP

1185 Avenue of the Americas

New York, New York 10036

Telephone: (212) 556-2100

Facsimile: (212) 556-2222

-And-

Richard C. Godfrey, P.C. (admitted *pro hac vice*)

Andrew B. Bloomer, P.C. (admitted *pro hac vice*)

KIRKLAND & ELLIS LLP

300 North LaSalle

Chicago, IL 60654

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In re	:	Chapter 11
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MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,	:	Case No.: 09-50026 (REG)
f/k/a General Motors Corp., <i>et al.</i>	:	
	:	
Debtors.	:	(Jointly Administered)
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**ORDER DENYING THE RELIEF REQUESTED IN PLAINTIFFS LAWRENCE  
AND CELESTINE ELLIOTT'S NO STAY PLEADING PURSUANT TO  
THE COURT'S SCHEDULING ORDERS AND MOTION FOR ORDER OF  
DISMISSAL FOR LACK OF SUBJECT MATTER JURISDICTION  
PURSUANT TO BANKR. R. 7012(b) AND FOR RELATED RELIEF**

Upon the *Plaintiffs Lawrence And Celestine Elliott's No Stay Pleading Pursuant To The Court's Scheduling Orders And Motion For Order Of Dismissal For Lack Of Subject Matter Jurisdiction Pursuant To Bankr. R. 7012(b) And For Related Relief* ("**Elliott Pleading**") filed by Lawrence and Celestine Elliott ("**Elliott Plaintiffs**") [Dkt. No. 12772]; and upon the *Response by General Motors LLC to No Stay Pleading Filed by the Elliott Plaintiffs*, filed by General Motors LLC [Dkt. No. 12782] ("**Response**"), and upon the other documents filed with the Court related to this matter; and a hearing (the "**Hearing**") having been held with respect to the Elliott Pleading and the Response on August 5, 2014; and upon the record of the Hearing, the Court having orally found and determined that the relief requested in the Elliott Pleading should be denied ("**Oral Ruling**"); and upon the Court issuing its *Decision with Respect to No Stay Pleading and Related Motion to Dismiss for Lack of Subject Matter Jurisdiction (Elliott Plaintiffs)* on August 6, 2014 [Dkt. No. 12815] ("**Decision**"), memorializing and amplifying the Oral Ruling issued at the Hearing; and after due deliberation and sufficient cause appearing therefore, it is hereby

**ORDERED** that the relief requested in the Elliott Pleading is denied in its entirety for the reasons set forth in the Decision; and it is further

**ORDERED** that the Elliott Plaintiffs' claims will be treated the same as those in the other Ignition Switch Actions.<sup>1</sup> The stay already imposed by the injunctive provisions of Paragraphs 8 and 47 of the Sale Order and Injunction (and that the Court may also impose by preliminary injunction) will remain in place insofar as it affects the Elliott Plaintiffs' amended complaint—subject to the right, shared by all of the other Plaintiffs in the Ignition Switch Actions, to ask that the Court revisit the issue after September 1; and it is further

**ORDERED** that the Bankruptcy Court shall retain jurisdiction to interpret and enforce this Order.

Dated: August \_\_, 2014  
New York, New York

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UNITED STATES BANKRUPTCY JUDGE

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<sup>1</sup> Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the *Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction*, dated April 21, 2014 [Dkt. No. 12620].